Regulatory Update within SCAQMD

AFCEE/CCR-S Air Quality Program Roundtable

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Overview

- Air Force Bases in South Coast Area
- Types of Permitted Equipment at Bases
- Major Air Quality Regulatory Programs
- On-going Permitting and Compliance Issues
- Proposed Regulatory Changes

Air Force Bases in South Coast

Air Force Bases with Active Permits in SCAQMD

- March Air Force Base (MAFB) - Riverside
  - California Air National Guard (CANG) is on the same property and shares the same flight apron
- Los Angeles Air Force Bases
  - El Segundo
  - San Pedro

Typical Permitted Equipment at the Bases

- March AFB
  - Emergency Internal Combustion Engines (ICEs)
  - Boilers
  - Jet fuel storage tanks
  - Bulk Loading and Hydrants for JP8
  - Spray booths
  - Gasoline dispensing
  - Tactical support equipment permitted by CARB pursuant to the Statewide Registration Program
- Los Angeles AFB
  - Emergency ICEs
  - Charbroilers

Major Air Quality Regulatory Programs

- Regional Clean Air Incentives Market (RECLAIM) Program
  - Emissions of NOx and SOx above 4 tons per year
  - Requires declining emissions or emission credits (RTCs)
  - Monitoring and Reporting requirements
- Title V – Operating Permits Program
  - All major sources (i.e. $\geq$ 10 tons per year of VOCs or NOx)
  - All applicable requirements incorporated in Title V permits
- New Source Review (NSR) for new or modified equipment
- Source Specific & Prohibitory Rules for new and existing equipment
- MACT/NESHAP/NSPS and other CAM requirements
- Subject to fees (permitting, emissions, etc.)
- State AB 2588 Toxics Hot Spots Program

New Source Review (NSR) Analysis Major Elements

- NSR for Non-Attainment Criteria Pollutants (Reg. XIII & R-2005)
  - BACT/LAER
  - Air Quality Modeling
  - Emission Offsets (ERCs, RTCs, etc.)
- Prevention of Significant Deterioration (PSD) for Attainment Pollutants (Reg. XVII)
  - BACT
  - Modeling/Increments/Impacts
- NSR for Toxic Pollutants (R-1401/1402)
  - Health Risk Assessment (HRA)
- Public Notices (R-212)

On-Going Compliance/Permitting Issues

- Pre-Construction Permits required for:
  - Construction of new or modification of existing equipment (RECLAIM/Title V permits)
  - Soil Remediation
  - Air Strippers for Groundwater Decontamination
- Notification and Approval required for:
  - Asbestos Abatement Activities
  - Tank Degassing
  - Open burn/training fires

Proposed Regulatory Changes

- Federal NSR Reform
- NSR (Reg. XIII) Amendments – to provide sources with additional options to offset emissions
  - Promote the generation and use of short-term area and mobile source credits
  - Increase the time to file for Emission Reduction Credits
  - Create a new emissions bank as a backstop.
- Proposed Diesel Air Toxics Control Measures (ATCM)

ERC Sharing Concept

Facility A: Original Unused Stream of ERCs

2002 (10 lbs)	2003 (10 lbs)	2004 (10 lbs)	2005 (10 lbs)	2006 (10 lbs)	2007 (10 lbs)	2008 (10 lbs)	2009 and on

Facility A: Splits Stream of ERCs

2002 (10 lbs)	2003 (10 lbs)	2004 (10 lbs)	2005 (10 lbs)	2006 (10 lbs)	2007 (10 lbs)	2008 (10 lbs)	2009 and on

Facility B: Short-Term Credits 2002-2007

Facility A: ERC Stream Begins 2008

Summary

- Continue RECLAIM Compliance
- Site Remediations, Demolitions and Closure/Redevelopment Plans (Soil, Water)
- Initial and Revised Title V Permits
- Toxic Requirements (MACT/NESHAP/ATCM)
- Proposed NSR Changes and Future Toxics Requirements